

## AFFIDAVIT

I, EDWARD RYAN, being duly sworn, hereby depose and say:

1. I am a Special Agent of the Federal Protective Service (FPS) for the Federal Protective Service, U.S. Department of Homeland Security, Immigration and Customs Enforcement. I have been employed with the FPS for a period of five years as a Special Agent. Prior to my employment with the Federal Protective Service, I was employed with the Federal Bureau of Prisons as a Senior Officer Specialist for thirteen years. I have served in the capacity as a Detention Enforcement Officer with the United States Immigration and Naturalization Service for one year. I have in excess of seventeen years service as a sworn Law Enforcement Officer.

2. This affidavit is in support of a criminal complaint charging LOUIS C. BOUMPANI and KATHY BOUMPANI as follows: In Count One, LOUIS BOUMPANI is charged with transporting a firearm in interstate commerce, while under indictment for a crime punishable by imprisonment for a term exceeding one year. LOUIS BOUMPANI and KATHY are each charged in Counts Two and Three with possession of a dangerous weapon in a federal court facility, and a federal facility, respectively, in violation of Title 18, United States Code, Section 930(a), (e)(1). This affidavit is based upon this affiant's investigation as well as information supplied to me by other law enforcement officials.

3. On July 31, 2008, I initiated an investigation after receiving a report that LOUIS C. BOUMPANI and KATHY BOUMPANI had attempted to enter the William J. Green Federal Office Building, located at 600 Arch Street in Philadelphia, Pennsylvania (The Green Building) and had weapons in their possession. I learned that while undergoing routine screening to gain entry to the upper floors of the Green Building by the Contract Security Officer, LOUIS C. BOUMPANI and KATHY BOUMPANI presented two brief cases and a cardboard box for screening through the X-ray magnetometer. The brief cases and cardboard box went through the magnetometer, and when screened, revealed two knives (which were approximately seven (7) inches in length) and live ammunition, including four (4) 20 gauge shotgun slugs; five (5) .22 long rifle rounds loaded in a magazine; and two (2) .25 caliber rifle rounds. The Contract Security Officer secured the brief cases and the cardboard box and requested assistance from the Federal Protective Service.

4. After advising LOUIS C. BOUMPANI and KATHY BOUMPANI of their Miranda rights and obtaining written Waiver of Rights forms from them, accompanied by other agents and officers, I interviewed them. The BOUMPANIs stated there were attempting to go the Federal Bureau of Investigation (FBI) (which is located in the Green Building) to report incidents of identity theft and mortgage fraud in Florida that had been perpetrated against them. The BOUMPANIs stated that they had parked their vehicle, a Chevrolet Astro Van, across the street in the National Constitution Center underground parking garage and come over to the Federal Building to meet with the FBI. The BOUMPANIs stated that there were numerous knives in their vehicle, but they did not possess any firearms to their knowledge. When I specifically told them that most people usually don't have ammunition without a gun, they each stated that

they did not any weapons other than the knives. I requested and was granted a Voluntary Consent to Search of their vehicle and a written consent was executed by KATHY BOUMPANI.

5. Prior to the commencement of the consent search of the BOUMPANIs' vehicle, a certified FPS explosive detection handler conducted an exterior check of the vehicle as well as other vehicles in the area. The handler observed an indication by his certified explosive detection dog that the car was potentially positive for the presence of explosives. Kathy BOUMPANI and I removed three (3) small dogs from the vehicle. With the doors of the vehicle open, the handler then conducted a search of the exterior of the vehicle. The explosive detection dog indicated the presence of explosives. Then, a visual search of the vehicle was conducted by myself and FPS Officer Anthony Fuscellaro at which time a shotgun was observed alongside the driver's seat between the front driver and passenger seats.

6. Following the observation of the shotgun, LOUIS BOUMPANI and KATHY BOUMPANI were arrested.

7. As a result of the observations of the shotgun and indication by the Explosive Detection Dog that there was the possibility of an explosive inside the vehicle, the Philadelphia Bomb Squad was called and responded to the BOUMPANIs' vehicle inside the underground garage. After a careful search, the bomb squad determined that the vehicle did not contain any explosives. However, the bomb squad recovered the following weapons and ammunition:

- one Remington 870, 20 gauge shotgun, serial no. AB6176S8U, which was loaded with four rounds of 20 gauge ammunition;
- one Savage Arms .22 caliber rifle, serial no. 0996658, which was loaded with nine (9) .22 caliber rounds;
- approximately six (6) additional 20 gauge shotgun rounds;
- one sword, approximately three (3) feet in length; and
- fourteen (14) assorted knives and daggers with lengths blade lengths of four (4) inches or more.

7. After LOUIS BOUMPANI was arrested, I readvised him of his Miranda rights, which he waived by executing a written waiver. BOUMPANI stated, in part:

- He and his wife, KATHY BOUMPANI, drove from their home in Palm Coast, Florida to Philadelphia in their Chevrolet Astro van leaving on Saturday, July 26, 2008 and arrived in Philadelphia on Monday, July 28, 2008.

- They transported two firearms and stated that the shotgun was loaded by him prior to their departure from Florida and remained loaded through their trip to Philadelphia.
- He admitted that he had recently been released on bail following his felony arrest for eluding police in Florida.
- He admitted that he knew that transporting a loaded weapon interstate was against the law.
- He stated that en route to Philadelphia, they traveled on local roads through the states of Florida, Georgia, Maryland, Delaware, and Pennsylvania, and used Interstate 95 through the states North and South Carolina and Virginia.
- He admitted that he and KATHY BOUMPANI brought knives into the federal building.
- He admitted that the knives that were brought into the federal building and the knives in the vehicle were his but the firearms were registered to his wife.
- He gave a handwritten statement in which he stated:

“I Louis C. Boumpani, sincerely apologize for any and all inconveniences that I have caused by my actions. I hereby withdraw my previous statement denying that my vehicle contained no firearms. I[n] fact it did. I am not proud of my actions, and in the future I will be more responsible.

My present circumstances involving recent events , made, in my opinion, the shotgun found in my vehicle, a necessary implement to defend myself, my wife. It was fully loaded at our departure from Florida, for this I take full responsibility. The knives in the aforementioned vehicle plus the one found in my cases that were carried by my wife and I were also mine. I regret deeply that I have created a situation that has caused stres[s] and added work because of my actions that were not meant to cause anyone here any harm.”
- He further stated that he and KATHY BOUMPANI parked their vehicle at approximately 5:45 a.m. in the underground parking garage. When they parked the vehicle, both the briefcases and the cardboard box were empty. Based upon their review of the materials, they loaded the two briefcases and the cardboard box with the materials that they felt were relevant to

their presentation to the FBI.

8. After KATHY BOUMPANI was arrested, FPS Supervisory Special Agent Martin Hughes readvised her of her Miranda rights, which she waived by executing a written waiver. She stated, in part:

- She and her husband, LOUIS BOUMPANI, drove from their home in Palm Coast, Florida to Washington, D.C. and then to Philadelphia in their Chevrolet Astro van, which she had purchased leaving on Saturday, July 26, 2008 and arrived in Philadelphia on Monday, July 28, 2008. She did most of the driving.
- She knew that the shotgun was inside the vehicle.
- She denied knowing that the knives were in the briefcases and cardboard box, which they brought into the courthouse. She suggested that possibly one of the dogs knocked one of the knives into the box brought into the courthouse.

9. The Green Building, located at 600 Arch Street in Philadelphia is, a 10 story building that houses a number of federal law enforcement agencies including the FBI, DEA and IRS, and U.S. Secret Service. In addition, in the Green Building are the following additional agencies and offices: the United States Probation Office and the United States Pretrial Services Office, and the United States Attorney's Office for the Eastern District of Pennsylvania, among others. The Green Building is connected to the United States Courthouse, located at 601 Market Street in Philadelphia through a common corridor. Magnometers that allow entry into the courthouse and the Green Building are in the same corridor. Near the entry to the magnometers are signs that provide notice to all persons seeking to enter the courthouse and the Green Building that bringing weapons into the buildings is prohibited and is a violation of federal law, citing Title 18, United States Code, Section 930.

10. Based upon these facts, I believe there is probable cause to issue a complaint and warrant charging LOUIS C. BOUMPANI and KATHY BOUMPANI as follows: In Count One, LOUIS BOUMPANI is charged with transporting a firearm in interstate commerce, while under indictment for a crime punishable by imprisonment for a term exceeding one year. LOUIS BOUMPANI and KATHY BOUMPANI are each charged in Counts Two and

Three with possession of a dangerous weapon in a federal court facility, and a federal facility, respectively, in violation of Title 18, United States Code, Sections 930(a) and 930(e)(1).

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**EDWARD RYAN**  
**Special Agent, Federal Protective Service**

**Subscribed and Sworn to before me on this  
31st day of July, 2008:**

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**HONORABLE DAVID R. STRAWBRIDGE**  
*United States Magistrate Judge*